

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA	X	
	:	
	:	
v.	:	Case No. 16-cr-00776 (VEC)
	:	
ALAIN KALOYEROS, et al.,	:	DECLARATION OF
	:	MICHAEL C. MILLER
	:	IN SUPPORT OF
Defendants.	:	MOTION FOR A
	:	BILL OF PARTICULARS
	X	

I, Michael C. Miller, Esq., hereby declare as follows:

1. I am a partner at Steptoe & Johnson LLP, located at 1114 Avenue of the Americas, New York, NY 10036.
2. I am counsel for Defendant Alain Kaloyeros in the above-captioned matter.
3. On May 16, 2017, I conferred with the Government in a good faith effort to resolve by agreement the issues raised in Defendant Alain Kaloyeros' Motion for a Bill of Particulars. The parties were unable to reach an agreement.
4. Attached as Exhibit A is a true and correct copy of an April 28, 2017 letter from Dr. Kaloyeros to the Government.
5. Attached as Exhibit B is a true and correct copy of a May 10, 2017 letter from the Government to Dr. Kaloyeros.
6. Attached as Exhibit C is a true and correct copy of a May 12, 2017 letter from Dr. Kaloyeros to the Government.
7. Attached as Exhibit D is a true and correct copy of a May 15, 2017 letter from the Government to Dr. Kaloyeros.
8. Attached as Exhibit E is a true and correct copy of a May 17, 2017 letter from the Government to Dr. Kaloyeros.

I declare under penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, New York
May 19, 2017

/s/Michael C. Miller
Michael C. Miller